

1 TIONNA DOLIN (SBN: 299010)
2 tdolin@slpattorney.com
3 ARIEL S. HARMAN-HOLMES (SBN 315234)
4 aharman-Holmes@slpattorney.com
5 Michael Tracy (SBN 237779)
6 mtracy@slpattorney.com
7 **STRATEGIC LEGAL PRACTICES, APC**
8 1888 Century Park East, 19th Floor
9 Los Angeles, CA 90067
10 Telephone.: (310) 929-4900
11 Facsimile: (310) 943-3838
12 Attorneys for Plaintiff,
13 PAUL GORDON

14 SPENCER P. HUGRET (SBN: 240424)
15 shugret@grsm.com
16 KATHERINE P. VILCHEZ (SBN: 212179)
17 kvilchez@grsm.com
18 TRINA M. CLAYTON (SBN: 204215)
19 tclayton@grsm.com
20 GORDON REES SCULLY MANSUKHANI, LLP
21 275 Battery Street, Suite 2000
22 San Francisco, CA 94111
23 Telephone: (415) 875-3193
24 Facsimile: (415) 986-8054
25 Attorneys for Defendant
26 FORD MOTOR COMPANY

27 **UNITED STATES DISTRICT COURT**
28 **EASTERN DISTRICT OF CALIFORNIA**

PAUL GORDON,

Plaintiff(s)

vs.

FORD MOTOR COMPANY, et al.,

Defendant(s).

) Case No. 2:21-cv-02175-JAM-DB

) Judge John A. Mendez
) Magistrate Deborah Barnes

) **JOINT STIPULATION TO**
) **CONTINUE EXPERT**
) **DISCOVERY DEADLINES**
) **(THIRD REQUEST)**

) Removal Date: November 23, 2021
) Trial Date: February 26, 2024

TO THE HONORABLE COURT:

IT IS HEREBY STIPULATED by and between Plaintiff PAUL GORDON (“Plaintiff”) and Defendant FORD MOTOR COMPANY (“Defendant”), (collectively the “Parties”), by and through their respective counsel of record, as follows:

WHEREAS, the Court previously granted a request to continue the trial and related deadlines on March 9, 2023 (Dkt #21).

WHEREAS, the existing dates the Parties request to change are:

- a. Initial Expert Disclosures: June 2, 2023
- b. Supplemental Expert Disclosures: June 16, 2023
- c. All Discovery Cut-Off: July 14, 2023

WHEREAS, Ford took the deposition of Plaintiff on April 10, 2023.

WHEREAS, Plaintiff attempted to take a Rule 30(b)(6) deposition, but Ford’s witness was unavailable,

WHEREAS, the parties attempted to schedule a Vehicle Inspection, but Ford’s expert was unavailable,

WHEREAS, the Parties have diligently worked to complete discovery,

WHEREAS, the deposition of Ford’s corporate representative and the Vehicle Inspection have not been completed, the Parties request an extension in the deadlines relating to the expert disclosures;

WHEREAS, this is the Parties’ third request to continue dates, the only dates requested changed in this request are the dates for expert disclosures and expert discovery;

WHEREAS, the Parties agree to continuing deadlines to the following dates:

- d. Initial Expert Disclosures: July 21, 2023
- e. Supplemental Expert Disclosures: August 4, 2023
- f. Expert Discovery Cut-Off: August 14, 2023

WHEREAS, due to the aforementioned reasons, the Parties believe there is good cause for their requested continuance of the above dates.

NOW, THEREFORE, IT IS HEREBY STIPULATED, and Counsel for the parties hereby jointly request and stipulate to continue the expert discovery dates, as listed above.

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained authorization to affix her electronic signature to this document.

Respectfully submitted,

Dated: June 5, 2023

STRATEGIC LEGAL PRACTICES, APC

By: /s/ Michael Tracy
Michael Tracy
Attorneys for Plaintiff,
PAUL GORDON

Dated: June 5, 2023

By: /s/ Katherine Vilchez
Attorneys for Defendant,
FORD MOTOR COMPANY

ORDER

The Court, having considered the Joint Stipulation to Continue the Expert Discovery Deadlines, filed by the Parties, and upon finding that good cause exists, hereby ORDERS as follows:

1. The Joint Stipulation to Continue Expert Discovery Deadlines is **GRANTED**.
2. Expert Discovery Cut-Off is continued to **August 14, 2023**.
3. Initial Expert Disclosures are to be exchanged by **July 21, 2023**.
4. Supplemental Expert Disclosures are to be exchanged by **August 5, 2023**.
5. Counsel shall contact Judge Mendez' courtroom deputy, M York, via e-mail at myork@caed.uscourts.gov, prior to filing a stipulation and proposed order to continue the dates set forth in this order.

IT IS SO ORDERED.

Dated: June 05, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE